



Verizon Communications
1300 I Street NW, Suite 400W
Washington, DC 20005

February 13, 2002

Ex Parte

William Caton
Acting Secretary
Federal Communications Commission
445 12th St., S.W. – Portals
Washington, DC 20554

RE: Application by Verizon-New Jersey Inc. for Authorization To Provide In-Region,
InterLATA Services in State of New Jersey, Docket No. 01-347 - REDACTED

Dear Mr. Caton:

Yesterday, K. McLean, J. Smith, J. Canny, C.B. Nogay, D. Albert, M. Detch, K. Zacharia, L. Owsley, D. Epps, J. Pachulskand C. Odom of Verizon met with J. Carlisle, A. Johns, J. Miller, J. Reel, R. McDonald, R. Tanner, B. Childers and G. Cohen of the Common Carrier Bureau to discuss OSS, force majeure clauses in interconnection agreements and dark fiber policy in NJ in the above application. The handouts distributed during that meeting are enclosed. The enclosures contain proprietary information and are subject to confidential treatment. A redacted version of this letter also is being filed. Please let me know if you have any questions. The twenty-page limit does not apply as set forth in DA 01-2746.

Sincerely,

A handwritten signature in black ink that reads "Clint E. Odom" followed by a stylized flourish or set of initials.

Clint E. Odom

Enclosures

cc: A. Johns
S. Pie
J. Carlisle
J. Miller
J. Reel
R. McDonald
B. Childers
G. Cohen

REDACTED – FOR PUBLIC INSPECTION

New Jersey

% of Loops
Provisioned
Aug - Dec

5 Month Performance

METRIC

LOOPS

Platform	Std		August Perf	August Obs	September Perf	September Obs	October Perf	October Obs	November Perf	November Obs	Ot
PR 4-04-3140 (% Missed Appt.-VZ-Dispatch-Platform)	Parity	58.19	CLEC	23.81%	21	19.23%	26	8.20%	61	3.49%	
			VZ	13.29%	42820	13.40%	36665	12.53%	45174	11.27%	3
			Z-Score		-1.09		-0.63		1.02		
PR 4-05-3140 (% Missed Appt.-VZ-No Dispatch-Platform)	Parity		CLEC	0.13%	1599	0.11%	913	0.12%	1707	0.25%	
			VZ	1.29%	206787	0.76%	163437	0.67%	203628	0.65%	17
			Z-Score		4.09		2.26		2.77		
PR 4-04&4-05 Combined	Parity		CLEC	0.44%	1620	0.64%	939	0.40%	1768	0.38%	
			VZ	3.35%	249607	3.08%	200102	2.82%	248802	2.41%	21
PR 2-01-3140 (Avg. Interval Completed-Tot. No Dispatch)	Parity		CLEC	1.51	599	1.58	491	1.43	714	1.59	
			VZ	2.72	17343	2.79	13967	2.24	16533	2.62	1
			Z-Score		7.19		4.62		4.41		
PR 2-03-3140 (Avg. Interval Completed-Dispatch (1-5 Lines))	Parity		CLEC	4	4	2.63	8	2.5	10	2.75	
			VZ	4.38	5058	4.33	4222	4.49	6012	4.24	
			Z-Score						1.31		
PR 2-04-3140 (Avg. Interval Completed-Dispatch (6-9 Lines))	Parity		CLEC	NA		NA		NA		2	
			VZ	7.31	273	6.7	256	6.8	262	6.45	
			Z-Score								
PR 2-05-3140 (Avg. Interval Completed-Dispatch (>=10 Lines))	Parity		CLEC	2	1	NA		2	1	2	
			VZ	9.57	70	3.95	111	5.69	81	7.41	
			Z-Score								
PR 2-01, 03, 04, 05 Combined	Parity		CLEC	2.50	604	2.11	499	1.97	724	2.09	
			VZ	6.00	22495	4.44	18324	4.81	22650	5.18	1
			Z-Score								
Stand-Alone		3.64									
PR 4-04-3113 (% Missed Appt.-VZ-Dispatch-Loop New)	Parity		CLEC	2.86%	105	2.06%	97	7.14%	112	3.03%	
			VZ	13.29%	42820	13.40%	36665	12.53%	45174	11.27%	3
			Z-Score		3.14		3.27		1.72		
PR 2-03-3112 (Avg. Interval Completed-Dispatch (1-5 Lines)-Loop)	Parity		CLEC	6.77	13	5.9	10	6	10	4.56	
			VZ	4.38	5058	4.33	4222	4.49	6012	4.24	
			Z-Score		-1.94		-1.41		-1.36		
PR 2-04-3112 (Avg. Interval Completed-Dispatch (6-9 Lines)-Loop)	Parity		CLEC	5	1	4	1	5	1	NA	
			VZ	7.31	273	6.7	256	6.8	262	6.45	
			Z-Score								
PR 2-05-3112 (Avg. Interval Completed-Dispatch (>=10 Lines)-Loop)	Parity		CLEC	5	1	5	1	NA		NA	
			VZ	9.57	70	3.95	111	5.69	81	7.41	
			Z-Score								
PR 2-03, 04, 05 Combined	Parity		CLEC	5.59	15	4.97	12	5.50	11	4.56	
			VZ	7.09	5401	4.99	4589	5.66	6355	6.03	
			Z-Score								
Hot Cuts		21.07									
PR 9-01-3114 (% On Time Performance - Hot Cut)	95%		CLEC	96.82%	880	96.85%	731	98.14%	1293	98.63%	
PR 2-01-3111 (Avg. Interval Completed - Total No Dispatch)	Parity		CLEC	6.41	322	6.26	270	6.07	646	6.23	
			VZ	2.72	17343	2.79	13967	2.24	16533	2.62	1
			Z-Score		-16.2		-9.91		-19.9		-1

New Jersey

METRIC	Stnd	% of Loops Provisioned Aug - Dec	5 Month Performance												
			August		September		October		November		December		August-December		
			Perf	Obs	Perf	Obs	Perf	Obs	Perf	Obs	Perf	Obs	Perf	Obs	
DSL Loops															
PR 4-04-3342 (% Missed Appt. - VZ - Dispatch)	< 5%	13.19	CLEC	0.59%	679	2.09%	573	0.49%	407	0.00%	277	0.00%	324	0.80%	2260
PR 2-01-3342 (Avg. Interval Completed - Total No Dispatch)	no stnd		CLEC	5.92	13	5.33	12	5.7	10	5.83	6	3.6	5	5.45	46
PR 2-02-3342 (Avg. Interval Completed - Total Dispatch)	no stnd		CLEC	5.66	258	5.72	249	5.62	157	5.72	74	5.57	129	5.66	867
2 Wire Digital															
PR 4-04-3341 (% Missed Appt. - VZ - Dispatch)	Parity	3.28	CLEC	4.80%	250	4.98%	201	8.49%	106	0.00%	72	1.75%	57	4.67%	686
			VZ	8.05%	1043	10.79%	945	10.15%	1202	8.04%	1032	7.38%	1071	8.88%	5293
			Z-Score		1.7		2.41		0.54		2.43		1.58		
PR 4-05-3341 ** (% Missed Appt. - VZ - No Dispatch)	Parity		CLEC	0.00%	62	0.00%	150	7.69%	26	0.00%	11	NA		0.80%	249
			VZ	1.26%	634	1.90%	632	1.83%	491	0.21%	478	1.10%	456	1.30%	2691
			Z-Score		0.85		1.53		-2.17		0.15				
PR 4-04, 05 Combined	Parity		CLEC	4.80%	250	4.98%	201	8.49%	106	0.00%	72	1.75%	57	3.64%	686
			VZ	5.48%	1677	7.23%	1577	7.74%	1693	5.56%	1510	5.50%	1527	6.32%	7984
PR 2-01-3341 (Avg. Interval Completed - Total No Dispatch)	Parity		CLEC	5.33	6	2.7	10	6.29	7	NA		NA		4.48	23
			VZ	8.25	461	2.94	418	2.74	397	6	17	6	18	4.83	1311
			Z-Score				0.35								
PR 2-02-3341 (Avg. Interval Completed - Total Dispatch)	Parity		CLEC	5.63	142	6.5	88	5.72	57	5.57	7	5	1	5.90	295
			VZ	9.38	758	4.32	476	4.91	599	6.03	128	6.48	126	6.56	2087
			Z-Score		5.7		-7.37		-3.56						
High Capacity															
PR 4-01-3200 (% Missed Appt. - VZ - Total - Specials)	Parity	0.63	CLEC	5.41%	37	14.81%	27	0.00%	22	0.00%	25	4.76%	21	5.30%	132
			VZ	5.76%	1337	20.38%	1536	4.25%	1554	8.86%	1219	2.52%	1665	8.29%	7311
			Z-Score		0.09		0.71		0.98		1.54		-0.65		
PR 2-07-3211 (Avg. Interval Completed - DS1)	Parity		CLEC	10.5	2	NA		NA		13	1	14	3	12.67	6
			VZ	11.99	214	7.42	267	8.85	238	7.43	288	9.21	289	8.84	1296
			Z-Score												

** Performance inadvertently omitted from C2C



NJ OSS Discussion with the FCC

February 12, 2002



PAGE REDACTED



How does Verizon NJ perform against the 97% benchmark for OR4-02?

- ❑ **Verizon has delivered over 97% of all Billing Completion Notifiers by noon the next day in NJ (the standard in NY is 95%)**

OR-4-02	Apr		May		June		July		August	
	Perf.	Obs.	Perf.	Obs.	Perf.	Obs.	Perf.	Obs.	Perf.	Obs.
UNE	99.00%	4,627	99.46%	4,800	97.89%	3,891	96.02%	4,584	94.31%	6,015
Resale	99.52%	20,410	99.69%	21,844	99.17%	21,977	99.22%	22,083	99.11%	22,926
Total	99.42%	25,037	99.65%	26,644	98.98%	25,868	98.67%	26,667	98.11%	28,941
OR-4-02	Sept		Oct		Nov		Dec		TOTAL	
	Perf.	Obs.	Perf.	Obs.	Perf.	Obs.	Perf.	Obs.	Perf.	Obs.
UNE	96.41%	5,346	75.91%	9,474	95.24%	5,961	97.30%	6,820	92.97%	51,518
Resale	99.04%	19,056	91.34%	23,234	97.38%	19,123	99.05%	19,203	98.10%	189,856
Total	98.46%	24,402	86.87%	32,708	96.87%	25,084	98.59%	26,023	97.01%	241,374

- ❑ **October, and to a lesser extent November, results were affected by a one-time clean-up associated with the retirement of LSOG 2**
- ❑ **The majority of volume in NJ is Resale which exceeded 99% in all months except October and November as noted above**



If the NJ and PA OSS are the same, why is flow-through performance different?

- ❑ **NJ and PA share the same OSS *except* for the service order processor (SOP)**
 - The same interfaces and gateways
 - The same billing systems
 - The same backend OSS for pre-order, provisioning, maintenance and repair

- ❑ **Even though the SOP is different, the same mass market UNE-P orders that are designed to flow-through in PA are also designed to flow-through in NJ**

- ❑ **Flow-through rates are affected by the type and mix of LSRs in a state in a given month – the order type and mix in NJ is different than in PA, as shown by the November 2001 data below**

	NJ	PA
% of Business LSRs	84%	14%
Volume of Business LSRs	6,600	13,000
% of Residence LSRs	16%	86%
Volume of Residence LSRs	1,300	80,000
% of Total UNE orders Eligible to Flow-through	58%	84%



How does Verizon NJ compare to Verizon PA for Confirmation and Reject Timeliness?

- ☐ Verizon has exceeded the UNE-P performance benchmarks in both states
- ☐ Performance is well within the standard intervals in both states month over month

Confirmation Timeliness in New Jersey and Pennsylvania								
UNE Platform								
Metric #	Metric Name	Standard	July 2001		August 2001		September 2001	
			NEW JERSEY	PENNSYLVANIA	NEW JERSEY	PENNSYLVANIA	NEW JERSEY	PENNSYLVANIA
OR-1-01-3140	Avg. Local Service Request Confirmation LSRC Flow -Through	No Standard	18.6 mins	14.4 mins	3.6 mins	9.6 mins	4.8 mins	8.4 mins
OR-1-02-3140	% On Time LSRC - Flow -Through	95% within 2 hours	95.71%	96.88%	99.09%	98.72%	99.38%	99.33%
OR-1-03-3140	Average LSRC Time < 6 Lines - Electronic - No Flow -Through	No Standard	10 hrs, 24.6 mins	6 hrs, 12 mins	9 hrs, 49.8 mins	7 hrs, 12.6 mins	11 hrs, 1.8 mins	9 hrs, 4.8 mins
OR-1-04-3140	% On Time LSRC < 6 Lines - Electronic - No Flow -Through	95% within 24 hours	98.34%	99.39%	98.71%	99.54%	98.02%	99.61%
OR-1-05-3140	Average LSRC Time >= 6 Lines - Electronic - No Flow -Through	No Standard	17 hrs, 18.6 mins	12 hrs, 37.8 mins	14 hrs, 17.4 mins	19 hrs, 49.9 mins	13 hrs, 7.8 mins	13 hrs, 11.4 mins
OR-1-06-3140	% On Time LSRC >= 6 Lines - Electronic - No Flow -Through	95% within 72 hours	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%
Reject Timeliness in New Jersey and Pennsylvania								
UNE Platform								
Metric #	Metric Name	Standard	July 2001		August 2001		September 2001	
			NEW JERSEY	PENNSYLVANIA	NEW JERSEY	PENNSYLVANIA	NEW JERSEY	PENNSYLVANIA
OR-2-01-3140	Average Local Service Request - LSR Reject - Time -Flow -Through	No Standard	0.6 min	12.6 mins	0.6 min	12.6 mins	1.8 mins	1 hr
OR-2-02-3140	% On Time LSR Reject - Flow -Through	95% within 2 hours	100.00%	98.03%	100.00%	98.02%	100.00%	98.58%
OR-2-03-3140	Average LSR Reject Time < 6 Lines - Electronic - No Flow -	No Standard	10 hrs, 48.6 mins	8 hrs, 9.6 mins	11 hrs, 11.4 mins	7 hrs, 58.2 mins	14 hrs, 1.2 mins	7 hrs, 22.2 mins
OR-2-04-3140	% On Time LSR Reject < 6 Lines - Electronic - No Flow -Through	95% within 24 hours	97.39%	99.85%	99.02%	99.84%	96.30%	99.86%
OR-2-05-3140	Average LSR Reject Time >= 6 Lines Electronic-No Flow -Through	No Standard	1 hr, 7.2 mins	1.2 mins	19 hrs, 49.9 mins	9 hrs, 7.8 mins	33 hrs, 44.4 mins	6 hrs, 37.2 mins
OR-2-06-3140	% On Time LSR Reject >= 6 Lines - Electronic - No Flow -Through	95% within 72 hours	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%



How does the 2001 Trouble Ticket rate for BOS BDT in NJ Compare to PA?

- ☐ The number of BOS BDT files in NJ is similar to PA when declared the Bill of Record
- ☐ Overall the number of BOS BDT Trouble tickets in NJ is lower than PA; ~ 50% are resends

	Jan-01	Feb-01	Mar-01	Apr-01	May-01	Jun-01	Jul-01	Aug-01	Sep-01	Oct-01	Nov-01	Dec-01
NJ												
# BDT	99*	106*	117*	118*	123*	134*	132*	108	111	116	125	130
BDT Trouble Tickets	3	1	2	2	7	6	9	4	13	7	10	4
BDT Tickets requesting Resends	2	0	1	1	3	5	5	1	3	4	5	2
PA												
# BDT	67*	103*	111*	110*	92	106	109	119	124	129	134	147
BDT Trouble Tickets	3	8	7	8	16	14	14	11	9	7	8	5
BDT Tickets requesting Resends	2	3	1	4	10	7	9	4	2	6	2	3

Notes

The BDT counts are taken from two different sources. Beginning with the implementation of the Wholesale Billing Service Quality Assurance process, BDT counts are produced mechanically as part of the process. This process was implemented in May 2001 in Pennsylvania and in August 2001 in New Jersey.

* Prior to implementation of the WBS Quality Assurance process, the count of BDTs was done manually. These numbers may include test files and BDT files with a zero balance due that are not counted in the WBS Quality Assurance process. As a result, these numbers may be slightly higher than the mechanized Quality



How does Verizon's New Jersey Wholesale Billing Performance compare to Pennsylvania?

☐ Bill Timeliness (BI-2-02)

- ☐ Verizon has consistently exceed the 98% benchmark in both New Jersey & Pennsylvania

☐ Bill Accuracy (BI-3-01 PA, BI-3-03 NJ)

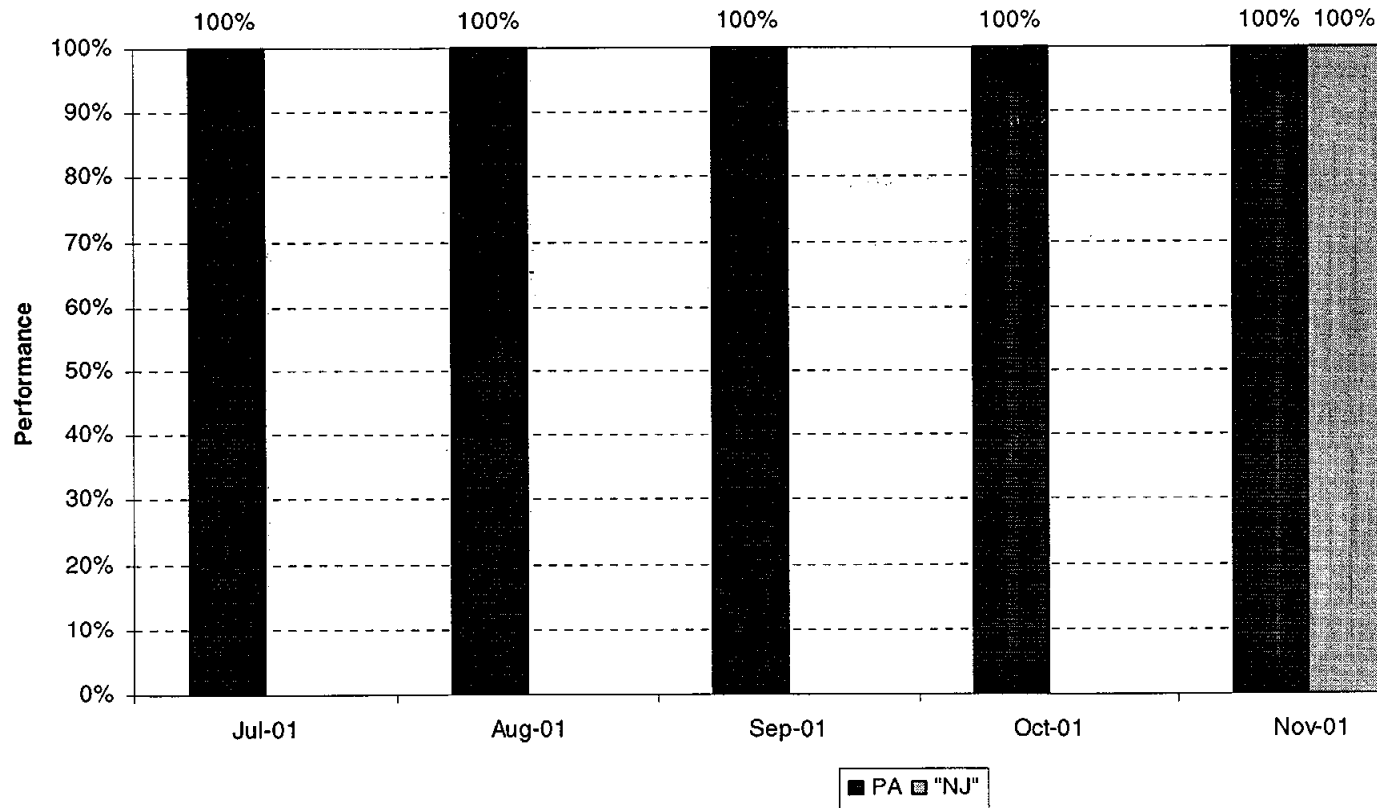
- ☐ Verizon's wholesale Bill Accuracy in New Jersey is consistent with both New Jersey retail performance and Pennsylvania wholesale performance
 - ☐ Adjusted for two anomalous adjustments

☐ Electronic Billing Performance

- ☐ Amount of Manual Balancing Adjustments is small and declining
 - ☐ Verizon proactively provides credits for manually inserted balancing records on a monthly basis
-
-



New Jersey - Pennsylvania
Billing - Timeliness of Carrier Bill - Electronic Bills - BOS format (BI-2-02)
Jul - Dec 01



☐ Verizon consistently exceeds the 98% performance level in b



New Jersey - Pennsylvania Comparison
Billing - % Billing Adjustments
Aug - Dec 01
With Adjustments

New Jersey
Excluding Charges Adjusted Due to PCDs (BI-3-03)

	<u>Aug-01</u>	<u>Sep-01</u>	<u>Oct-01</u>	<u>Nov-01</u>	<u>Dec-01</u>	<u>Aug - Dec</u>
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VZ-NJ						
Performance	1.48%	1.57%	1.06%	1.60%	1.16%	1.38%
Observations	431351461	422233899	425932191	422824290	411854643	2114196484

CLEC-NJ						
Performance	0.71%	1.29%	1.35%	0.92%	1.15%	1.09%
Observations	19053489	20836318	18053461	18200086	17314584	93457938

Pennsylvania
Paper Bills (CRIS & CABS combined) (BI-3-01)

VZ-PA						
Performance	2.21%	2.16%	1.81%	1.17%	1.37%	1.75%
Observations	375493766	384257658	360683716	363903466	357875039	1842213645

CLEC-PA						
Performance	1.54%	2.06%	2.48%	1.88%	1.30%	1.81%
Observations	26234938	17736950	16373466	17224759	18905507	96475620

Note: The August PA CLEC BI-3-01 performance was adjusted to reflect a conversion credit and the September NJ CLEC BI-3-03 performance was adjusted to reflect an anomalous billing claim.

☐ *Verizon's performance in NJ is consistent with NJ retail performance and PA wholesale performance*



PENNSYLVANIA-NEW JERSEY COMPARE
BDT Adjustments as a Percent of Current Charges

	Sep-01	Oct-01	Nov-01
	PA	PA	PA
Total Current Charges	\$12,010,296.60	\$12,181,231.47	\$12,563,209.56
Total Adjustments	\$36,225.10	\$24,866.95	\$34,219.17
% of Current Charges	0.30%	0.20%	0.27%

	Sep-01	Oct-01	Nov-01
	NJ	NJ	NJ
Total Current Charges	\$4,937,080.15	\$5,275,735.68	\$5,720,372.06
Total Adjustments	\$35,630.48	\$27,382.25	\$28,109.95
% of Current Charges	0.72%	0.52%	0.49%

☐ Verizon proactively provides credits for manually inserted balancing records c